

LAW OFFICES OF
ALLAN P. HABER, ESQ.
220 East 73rd Street, Apt. 1DD
New York, New York 10021

OF COUNSEL
STEPHANIE CARVLIN, ESQ.
GEORGES G. LEDERMAN, ESQ.

TELEPHONE: 917-374-4666
E-MAIL: allan@haberesq.com

ASSOCIATE
JACOB BARCLAY MITCHELL, ESQ.

September 15, 2020

Honorable William H. Pauley III
District Court Judge
US Courthouse, S.D.N.Y.
500 Pearl Street
New York, NY 10007

Application granted.

SO ORDERED:

Re: United States v. Jaime Santana
Ind. No. 19 Cr. 734(WHP)


WILLIAM H. PAULEY III
U.S.D.J.

Dear Judge Pauley III:

September 15, 2020

I write to request the services of a mitigation expert in the above matter. On September 3, 2020, Jaime Santana pled-guilt, by video conference to participating in a racketeering conspiracy (18 U.S.C. 1962(d); and conspiracy to possess and distribute 50 grams or more of methamphetamine, and detectable amounts of cocaine pursuant to 21 U.S.C. 841(b)(1)(B). He admitted, under oath, membership in the MS-13 enterprise. Although Mr. Santana speaks good English his reading and writing leave much to be desired. Additionally, he has a mental-health issue that requires obtaining medical records from a number of different facilities. Most of his family lives in the greater NYC area so would be readily accessible to my expert. He also has some family in TN, however, they can be interviewed by telephone in order to avoid travel.

My expert is Kathleen O'Boyle who is on the approved CJA mitigation list for capital offenses. I have worked with Ms. O'Boyle over the years on capital and non-capital cases and know her to be an outstanding mitigation expert. Ms. O'Boyle was vast experience in criminal justice having worked in the field for over 20 years.

I have discussed the case with Ms. O'Boyle and she believes she can complete the report in under 50 hours. As a consequence I am requesting 40 hours on her behalf at the low end of the new presumptive rate of \$125.00 per hour for a total of \$5,000.00

If you approve this request I will forward a copy to the CJA clerk so they can add Ms. O'Boyle to my voucher.

Thank you for your consideration.

APH: fms

Respectfully,

_____/s/_____
Allan P. Haber, Esq.